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ABSTRACT

A study examined dimensions of oral proficiency curriculum and testing (OP) in American colleges and universities for the purpose of appraising the implementability of educational policy derived from them. The framework used for this policy analysis looks at the system environment, demands and resources, the process that converts demands into public policy, the policies representing formal goals or intentions of foreign language educators and governance units, classroom implementation of OP, and outcomes. The report discusses each of the components listed above, based on available research and analyses, and presents the following suggestions: (1) successful implementation of the Foreign Service Institute (FSI)/American Council on the Teaching of Foreign Languages (ACTFL)/Educational Testing Service (ETS) oral proficiency guidelines depends on a large number of variables, many of which are uncontrollable; (2) the political nature of higher education may not support rational choices or achievement of targeted policy outcomes; (3) OP advocates may overlook individual institutional characteristics and availability of resources; (4) there may be unrealistic student achievement expectations; (5) elite institutions are more likely to be successful in implementation; (6) campus innovations may confound the universal value of the proficiency score; and (7) OP claims will continue to be questioned. (MSE)

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The Implementability of the FSI/ACTFL/ETS Oral Proficiency Guidelines in Foreign Language Programs of American Colleges and Universities

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A research paper submitted in partial fulfillment
of the requirements for the degree of
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STUDY PURPOSE

The purpose of this study is to examine dimensions of oral proficiency (OP) curriculum/testing in foreign language programs in American colleges and universities for the purpose of appraising the implementability potential of derived policy.

INTRODUCTION

The past decade has witnessed a renewal of attention to the foreign language curriculum of American colleges and universities. A number of reports and studies on the condition of foreign languages and area studies (FLAS) in higher education - - the Presidential Commission on Foreign Language and International Studies, STRENGTH THROUGH WISDOM (1979), its accompanying volume of background papers (1979), the Rand Corporation-NEH study on employment needs in FLAS, FOREIGN LANGUAGE AND INTERNATIONAL STUDIES SPECIALISTS: THE MARKETPLACE AND NATIONAL POLICY (1979), and two reports written and edited by Lambert, BEYOND GROWTH: THE NEXT

STAGE IN LANGUAGE AND AREA STUDIES (1984) and POINTS OF LEVERAGE: AN AGENDA FOR A NATIONAL FOUNDATION FOR INTERNATIONAL STUDIES (1986) - - reflect concern for the condition of foreign language education. A common assumption of the reports is that foreign language education in the United States is not achieving its goals, and that it must be changed in tandem with an increase in government support. Lambert, in particular, advocates the adoption of an oral proficiency curriculum/testing model applied in government language schools. Such an adoption would lead to some commonality of curricular practice, and de facto common policy. To this end, Lambert and other advocates (1984,1986) promote the use of a universal proficiency score or "common metric"; specifically, the Foreign Service Institute (FSI) scoring system used by government agencies that was developed by the state department and subsequently modified by the American Council for the Teaching of Foreign Languages (ACTFL)(see Lowe, 1983, p.231).

During the past decade, a number of states such as Indiana and Texas, and institutions of higher education like Portland State University, the University of Southern California, Brigham Young University, and the University of Pennsylvania have used a modified version of the ACTFL-FSI proficiency scale for a variety of purposes; for teacher certification, for the establishment of proficiency levels for teaching assistants, and for granting academic credit to meet general education requirements for the baccalauriate degree.

ANALYTICAL/METHODOLOGICAL FRAMEWORK

The problem of policy implementation will be examined using a modified version of the analytical framwork suggested by Van Meter and Van Horn in "The Policy Implementation Process: A Conceptual Framework," ADMINISTRATION AND SOCIETY (Vol. 6, No. 4, February 1975, pp. 445-448). The framework has been modified in consideration of organizational features of higher education institutions which are defined according to the typologies of Pfeffer in POWER IN ORGANIZATIONS (1981).

The Van Meter-Van Horn framework consists of the following components (p.446):

(1) the environment of the system; the organizational context of higher education in the United States;

(2) the demands and resources that carry stimuli from government to policy makers; interpreted here in terms of the various reports pertaining to the functioning of foreign language programs in American higher education. Resources include those language programs currently in place at institutions;

(3) the conversions process -- including formal structures and procedures that transform and convert demands into public policies -- which will be viewed to encompassing the adaptation of an OP curriculum;

(4) the policies that represent the formal goals

intentions, or statements of foreign language educators and governance units (departments, divisions) regarding the achievement of language proficiency;

(5) performance with regard to the implementation of OP in the classroom; and

(6) feedback via outcomes which include OP scores of students and the production of persons proficient in the use of a foreign language. Does this satisfy the demands of the greater environment?

This study relies on available research and analyses in order to assess the implementability of the OP curriculum; the status of progress in translating policy objectives into meaningful outcomes will be suggested.

STUDY CONTEXT (ENVIRONMENT)

The American system of higher education is highly diffuse and pluralistic. It consists of well over 3000 public and private institutions where the range of curricular offerings spans a spectrum from a total absence of foreign language instruction to the presence of multiple foreign language learning opportunities. These programs may either be voluntary, or part of a cumpulsory general education / liberal arts requirement. They can vary from a minimum of two quarters to four or more semesters. Opportunities for a major/minor concentration may or may not exist for students. Languages can also be divided into categories such as frequently taught/less frequently taught. Class sizes may vary from optimally small to excessively large (forty or more students). Staff qualifications may range from the minimal B.A. degree to the Ph.D., and teachers may be non-native or native speakers, who come from either a foreign

country or from a language minority population in the United States.

The funding bases of colleges and universities also vary widely. Private institutions may be selective, charge high tuitions and fees, have substantial endowments, and attract large numbers of grants and contracts, or they may be operationally marginal with open admissions, declining enrollments, and little or no endowment. The latter institutions are commonly substantially reliant on student tuition and fees, which are made available through federally financed student loan and grant programs. Public institutions also reflect wide variance in terms of funding sources, and may depend on a tax base that is, in turn, inextricably tied to the health of the economy. Some may rival private elite universities in terms of available resources; others may not be as fortunate. Some institutions are part of state university systems in which funds are distributed according

to enrollment driven or directed funding formulas that line-item the amount of resources available to various programs.

The underlying assumption of this study, however, is that finite resources impact choices in both public and private institutions, and that the internal distribution of available resources depends upon internal as well as external institutional politics (Pfeffer, p.6).[1] Given the presence of political and related factors, higher education organizations may be conceptualized as organizational environments where rationality may have a marginal affect on choice. Elements of Pfeffer's and other organizational models are present: the bureaucratic, given the presence of precedent, tradition, routine, and predictability; the political, given the presence of conflicting interests and the legitimation of conflict; and the decision process/organized anarchy, given sometimes unclear

and ambiguous goals, decentralized (even anarchical) power bases, disparities between decisions and intention, and the haphazard collection and use of information (research)(viz. Pfeffer, p. 31). The presence of rational activity and decision making in teaching and research, or the assumption that teaching and research are rational activities reinforce the myth that the university is an organization of rational choice. According to Pfeffer,

> Rational decision making is an ideal which, even if not empirically descriptive, is to be kept for both external and internal system maintenance at all costs. Thus, it is in the interests of all who share the belief in the myth of rational choice that decisions appear to be made rationally rather than to be based on power and politics (p.50).

March and Cohen (1986) define rationality as a procedure for deciding what is "correct behavior by relating consequences systematically to objectives"(p.218). Furthermore, Pfeffer(1981) noted that the normative value of the rational model of choice may induce organizational actors to be insensitive

to the operation of organizational politics and naïve about the distribution of power in the organization (p.55). If we apply this observation to foreign language faculties in colleges and universities, we may begin to understand the periods of inactivity that have characterized their behavior over the last two decades. Burn and Perkins (1980) have referred to the political naïvite of professionals in foreign languages and area studies (p.30). Tonkin and Edwards (1981) have observed the disinclination of language departments and faculty to justify themselves, even though foreign languages are often the only introduction that undergraduates have to international affairs (p.165). Except for federal subsidies to language and area study centers under NDEA and other legislation, foreign languages as disciplines do not generate large numbers of grants and contracts for colleges and universities as, for example, the natural and social sciences. The internal leverage derivative of

high level production of institutionally valued resources may not accrue to foreign language programs and may impair their relative ability to lay claim to large proportions of available resources.

DEMANDS AND RESOURCES

The employers of proficient speakers of foreign languages include education, government, and business. In the latter two arenas, there is the expectation that language proficiency accompany professional or technical expertise. The social value of foreign language proficiency may be extended from the ideal of the liberally educated individual, on one hand, to perspectives of vocational utility on the other. Government needs for foreign language speakers are discussed in the Perkins (1979) report, STRENGTH THROUGH WISDOM, its accompanying volume of backgrcund reports, and the two Lambert (1984, 1986) reports, BEYOND GROWTH and POINTS OF LEVERAGE. Business needs were articulated in the Rand-NEH (1979) study, FOREIGN LANGUAGE AND

INTERNATIONAL STUDIES SPECIALISTS. Educational viewpoints regarding the need for foreign language specialists are presented in various professional journals, and are far from being uniform.

In general, the government position suggests a shortfall of proficient speakers of foreign languages in government agencies, and the absence of qualified speakers of less taught languages in the foreign service. They point to a lack of language skills among job applicants, and a paucity of requirements for language skills in employment which emphasizes technical compentencies.
It has been pointed out, however, that government policies have failed to encourage language acquisition or to reward language proficiency; nor does the government make effective use of specialists (Rand-NEH, p.165).

Business demands for proficient second language speakers have been much more diffuse and difficult to

identify. In 1980, Hayden commented that "except for a core of large, high-powered corporations, U.S. firms are generally tied to a domestic orientation. The size, stability, and wealth of the U.S. market have not necessitated an international push"(p.143). Also, there is little evidence that foreign language proficiency in combination with business skills carries much weight in hiring decisions (Ibid, p.146). According to the Rand (1979) study, the primary areas of need are in banking, journalism, international law, and international trade (p.xii). These needs assessments were completed a decade ago, and the international business climate is changing rapidly. There is a fundamental difference between the presidential commission report and the Rand report, with the former assuming an advocacy role in favor of increased supply and utilization of FLAS specialists and the latter describing the current (1979) conditions of the marketplace (Pincus, 1980, p.88).

The Presidential Commission was an advocacy group determined to "offer a scheme to reconstruct and expand government subsidy of language and international studies"(Pincus, p.88). Government interests articulated national defense needs; business interests emphasized the economic welfare of individual companies and, by extension, the national economy. According to Pincus (1980), demand and supply implied desirable levels in terms of the number of people that ought to be trained and employed as language/area specialists according to a national welfare concept of national need; a "normative conception" of shortage with a "meager" evidentiary basis (pp. 82-83,87,88). Buck and Forsyth (1985) have noted that business expressions of demand are still unclear, and that the use of such terms as "fluent, fully bilingual, knowledge, working knowledge, excellent skills" are not based on any system of analysis and description (p.151).

Educational demand manifests itself in two distinct categories, the first of which reflects the liberal arts philosophy of the educated individual. The influence of this group waxes and wanes more or less on a cyclical basis. With the current emphasis on educational quality, its influence appears to be growing. The second category has a more vocational outlook and focuses on applied language needs outside of the academy in government and business, as well as in the public school system.

The public schools, business (proprietary language schools), and government training programs have functioned as suppliers of speakers of foreign languages. However, the focus of this study is on the role of college and university foreign language programs. From 1979 onward, government reports have assumed that college and university programs were inadequate, that they produced a product incompatible with government needs (Lambert, 1984, p.44-46).

By the end of the 1970's, the outlook for college and university foreign language programs was unfavorable. Those programs still included in the curriculum were survivors of what Buck and Forsyth (1985) have termed "the Great Enrollment Depression"(p.148). Programs suffered not only a loss of students, but also a loss in funding. NDEA (National Defense Education Act) funding for language programs and area studies centers had declined. According to Kerr (1980), by 1977, the percentage of students enrolled in foreign language classes had decreased from seventeen percent to eight percent (p.xxiv). In 1966, eighty-nine percent of colleges and universities had foreign language requirements for graduation; by 1974, this college and university requirement had decreased to fifty-three percent. Between 1974 and 1977, offerings in German were eliminated at 102 post-secondary institutions, and Russian was eliminated from fifty-seven programs (Thompson, 1980,p.50).

By 1980, only eighteen percent of colleges and universities required a foreign language for graduation (Thompson, 1980, p.50). In institutions funded according to enrollment driven funding formulas, administrators shifted resources away from foreign language programs into market driven programs (Lambert, 1984,pp. 40,42). Even if programs did survive, staffing needs may have shrunk, or the academic major may have been dropped.

These were the circumstances when the Presidential Commission of Foreign Language and International Studies was convened in 1978. A common criticism of both secondary and post-secondary language programs was that many students do not remain in programs long enough to achieve any real proficiency (Burn, 1980, p.51). Only one in twenty high school students studied beyond the second year (STRENGTH THROUGH WISDOM, 1979, p.7). No systematic effort to assess the actual language proficiency of the products of

college and university programs was ever undertaken, however, by the Presidential Commission or any of its panels, or by other individuals or groups, including foreign language advocate/critic Paul Simon, who cites a 1967 study from Harvard that documented the performance of college majors (Simon, 1980,p.40). Reports utilizing data derivative of either personal accounts or the use of others' perceptions of quality, frequently in anecdotal form and without documentation, often constitute the literature on the topic. It follows that instructional quality and student proficiency standards may have suffered in those programs that had to struggle throughout the 1970's to maintain a toehold in the curriculum. However, there are no hard data to substantiate either the presence or absence of product quality; specifically,proficient speakers of foreign languages. The knowlege base related to supply is just as marginal today as it was a decade ago. We

may assume that the Presidential Commission report and its successors have stimulated debate which may have influenced the decisions of colleges and universities to add or to reinstate the foreign language requirement. In recent years, enrollments have increased in some languages, particularly Japanese and Chinese (CHRONICLE OF HIGHER EDUCATION, February 17, 1988, p.A35). The latest statistics available (1986) are drawn from 832 two-year colleges and 1511 four-year colleges and universities (MLA NEWSLETTER, 1987,p.10). The total foreign language registrations for 1986 were 1,003,234, up 3.9 percent over the total of 966,013 for 1983. These statistics do not distinguish advanced learners, who are more likely to achieve proficiency, from beginning learners. They do represent the potential of college and university foreign language programs to contribute to the present and future supply of speakers of foreign languages in the United States.

THE CONVERSIONS PROCESS

Those who advocated the adoption of OP curriculum/ testing for second language instruction had to define the meaning of oral proficiency and demonstrate the inadequacies of present programs. Lowe (1985) has defined proficiency as the "global rating of general language ability over a wide range of functions and topics at any given level"(pp.16-17). Savignon (1983) stated that the language proficiency test measures linguistic competence, but actual use of the language for communication requires communicative competence (p.68). James (1985) indicated that proficiency is a continuum with isolated linguistic items at one end and individualistic language samples at the other (p.2). There is a lack of unanimity among OP advocates regarding the actual nature of language proficiency. Farhady (1982) stated that language proficiency

is one of the most poorly defined concepts in the field of language testing; to suggest that what learners have learned and how they have learned it are irrelevant to language proficiency constitutes a "gross and missleading assumption"(pp.44-45).

Both the FSI-ILR and the ACTFL-ETS proficiency scales divide levels of proficiency into five to seven horizontal levels ranging from zero (no ability) to "educated native speaker"(Lowe, 1985, p.14; Omaggio, 1986, p.11). The Omaggio scale has been reproduced in Appendix A (p.54). Numeric scores are achieved using the oral proficiency interview (OPI). These scores are supposed to indicate the learner's level of proficiency. Lambert and others (1984) have noted that the amount of time invested in the learning of languages is directly proportional to the level of proficiency achieved (p.72). To reach the minimally required FSI level two requires 840 hours of classroom learning, or a maximum of

34 weeks in difficulty Level I languages (Spanish, French, Dutch, Basque, Norwegian, Portugese, Swedish, Swahili); 1140 hours, or a maximum of 48 weeks for Level II (German, Hindi, Indonesian, Urdu); 1800 hours, or a maximum of 76 weeks for Level III (Czech, Russian, Lao, Vietnamese, Hebrew); and 2400 hours, or a maximum of 102 weeks for Level IV (Arabic, Japanese, Chinese, Korean). These figures translate into class time of six hours a day, five days a week. Preparation time outside of class is not included. Government language programs also function in an environment with optimal controls on variables: a tightly controlled organization, quality control, classes that teach to the exam, continuous feedback and, above all, ambitious, motivated articulate students who are paid to be in the programs and whose careers depend on their performance (Young, 1980, pp.64-65; Benseler, 1981, p.268).

In 1978, the Department of Education funded a study

by ETS (Educational Testing Service) that affirmed the transferability of FSI proficiency scales to universities (Lowe, 1983, p.232). (The disinterested observer might question, however, the possibility of vested interest, if ETS is to be a major supplier of tests suggested by outcomes of the research.) The transferability finding was reinforced by the Lambert and associates study BEYOND GROWTH (1984); a study published as a report of the Association of American Universities and prepared under a contract from the Department of Defense -- a user of FSI scales. The report appears to be an effort to demonstrate the superiority of government language programs. Lange (1987) has observed, however, that this report presents no significant data in support of contentions that government programs are in fact superior to their academic counterparts (p.243). Lambert and associates (1984) advocated the adoption of the FSI scoring system, a so-called "common metric" with a universal value, as the means to determine

proficiency in programs at colleges and universities (p.50). The common metric would facilitate the centralization of policy, and would provide program control otherwise not attainable in the American education system (Lange, p.246). Lowe (1983) may have identified the government motivation for seeking the widespread adoption of the FSI-ACTFL scale; the government would like to reduce current expenditures on its own language programs, and shift costs to the state, public, and private sectors of education (p.238).

FORMAL GOALS, INTENTIONS, STATEMENTS

In 1986, the American Council on the Teaching of Foreign Languages (ACTFL) officially adopted guidelines of an OP curriculum, and dropped the descriptive adjective "provisional" from their recommendations (Omaggio, p.11). Prior to this date, stimulated by the prospect of renewed vitality for foreign language programs, a number of colleges and universities, states, and educational organizations

adopted the OP curriculum/testing program. Some of these organizations included Brigham Young University, Ohio State University (for TAs), San Antonio College, Portland State University, Georgetown University (for MA degrees in ESL), the University of Pennsylvania, the Tennessee Foreign Language Teachers Association, the Washington area TESOL, California, Illinois, Indiana, and Texas (Lowe, 1983, p.239; Young, 1980, p.65; Freed, 1987). By way of contrast, it should be noted that the term "proficiency" can be used in a non-ACTFL-ETS context. The proposed New York State Syllabus, MODERN LANGUAGES FOR COMMUNICATION (c1986) stated: "The term 'proficiency' should not be confused with native or near-native 'fluency.' Instead, it refers to the degree of control of the basic elements of the language that the student should be able to demonstrate at each checkpoint" (p.23). These proficiencies are intended to accommodate the learning styles and abilities of all students and to

stress the successful communication of meaning rather than undue emphasis on structural accuracy (New York, p.23).

In 1983, the U.S. Department of Education funded a pilot project in Texas to develop a state OP model for the certification of foreign language teachers (Hiple and Manley, 1987). Although the task was completed and the model endorsed, the Texas Department of Education has not yet implemented state mandated standards and procedures. The maintenance of the status quo may be a consequence of the ongoing controversy in Texas regarding the larger issue of teacher competency testing.

The adoption of OP curriculum/testing guidelines in colleges and universities has accelerated. The University of Iowa, for example, will examine these options next year. At this point, it is important to note that the FSI/ACTFL/ETS advocates of the OP curriculum assume that the decision to implement this program is an outcome of

rational choice, and that the language learning process is a linear activity.

POLICY PERFORMANCE

The tractability chart (p.28) utilizes the forms of the Hunter Community Leadership Index (Miller, 1983, pp. 398-400): It is designed to delineate and weight the success potential for implementation of the FSI/ACTFL/ETS Guidelines in the context of foreign language programs in American colleges and universities. For purposes of comparison, institutions are classified as either "Elite" or "Non-Elite". Although imprecise, this categorizing terminology is commonly used in academia. "Elite" includes Ivy League institutions, outstanding public and private research universities, and selective liberal arts colleges with the Carnegie classification LA I. "Non-Elite" schools include community colleges, non-selective four-year comprehensive state, regional, and private institutions, and liberal arts colleges with the Carnegie classification LA II. Thirty variables/

CHART

Comparative Characteristics of Selected Variables for Predicting the Implementability of OP Curriculum/Testing in College and University Foreign Language Programs as Compared with Government Programs.

Characteristic/Variable	/Non-Elite/	Elite	/Gov.P./
Students: 1) high motivation	+2	+4	+4
2) low motivation(-)	-3	-1	0
Aptitude: 1) high	+2	+4	+3
2) low (-)	-3	0	-1
Age Cohort: 1) homogeneous[1]	+1	+3	+1
2) heterogeneous	+4	+1	+2
Curricular Requirements: 1) general educ.	+1	+3	0
2) electives	+2	+4	0
Paid attendance of students	0	0	+4
Time in class per week:			
1) intensive, 30 hrs	0	0	+4
2) non-intensive 4-5 hours	+2	+4	0
3) non-intensive, 2-3 hours	+3	+1	0
Immersion Programs: 1) exist in curriculum	+1	+3	+4
2) do not exist (-)	-3	-1	0
Class Size: 1) 8-10 students, less	+1	+3	+4
2) 15-35 students, or more (-)	-4	-1	0
Staffing: 1) adequate	+1	+3	+4
2) inadequate (-)	-3	-1	0
3) full-time	+2	+3	+4
4) part-time	+3	+1	0
FSI-ACTFL-ETS training available	+1	+2	+4
Funding: 1) adequate	+1	+3	+4
2) inadequate (-)	-4	-1	-1
FL pedagogical goals:			
1) agreement	+2	+3	+4
2) non-agreement (-)	-3	-2	0
Organizational Cohesiveness:			
1) tight	+1	+1	+4
2) loose	+3	+4	0
Immediate Performance Feedback	+2	+3	+4
FSI-ACTFL-ETS OP Testing	+1	+2	+4
In-house Version of OP Testing	+1	+3	0
Positive Score:	37	58	58
Negative Score:	-23	-7	-2
Systemic Non-comparative Zeroes:	2	2	12

[1] Homogeneous refers to traditional college age group, and could include some military language program paricipants. Liberal arts colleges are more homogeneous than other segments of the educational spectrum, in particular those that are residential.

characteristics are subjectively assigned values ranging from +1 to +4 and -1 to -4. Zero (0) is used where items have no systemic applicability. The assignment of a numeric value is based on the assumption of how a particular institutional characteristic may add to or detract from the implement-ability of the FSI-ACTFL-ETS guidelines. Because government programs usually function as the norm, they are more likely to carry the highest positive (+4) or the lowest negative (-1) value. Negative characteristics that would impede implementation are identified with a minus (-) sign. This list of characteristics could serve as a check list for an institution contemplating the implementation of the OP guidelines. While the assigned values are subjective, they are an effort to isolate those factors that may have an impact on policy implementation.

Non-elite institutions have the largest negative score (-23), which suggests that negative factors are much

stronger in those environments. Non-elite colleges and universities also had the lowest positive score (+37). Zeroes for non-systemic items were the same for non-elite and elite institutions; both categories totaled two zeroes. On the other hand, non-comparative zeroes for government programs totaled twelve. A large number of factors that are present in colleges and universities are not present in government programs. Government programs have features that are not present in college programs, such as the paid attendance of students. Government programs also received the lowest negative score (-2), and their positive score (+58) was achieved on the basis of fewer factors than the equivalent positive score (+58) for elite institutions. However, elite institutions had a relatively low negative score (-7), which suggests that the prospects for a successful implementation of the OP curriculum are greater in these environments. The negative score for

non-elite colleges and universities suggests that achievement of the OP curricular guidelines will be much more difficult for those institutions.

Other assumptions made in the chart need clarification. With reference to high aptitude, it is assumed that students in elite colleges and universities may actually exceed the aptitude levels of some government program participants. Whereas elite colleges are not likely to have students with low aptitude, non-elite colleges are more likely to have them. The chart also assumes that students at elite institutions are more likely to exhibit higher levels of motivation than students at non-elite schools, in general. Foreign languages in the curriculum are more likely to be both required and elective subjects at elite colleges than at non-elite colleges. Conditions for staffing and funding are also assumed to be more favorable at elite colleges and universities.

A measure of the performance of the OP curriculum/testing is, by its own definition, found in the proficiency ratings of the students. The critical question is: Does the OP curriculum/test actually deliver the fluent speakers of foreign languages that it promises? In government programs, the answer is affirmative. However, for college and university programs, a response cannot be ascertained until a number of variables in those environments are addressed. The tractability chart on page 28 has already introduced some of these variables and characteristics into the discussion. First of all, there is the possibility of a fundamental systemic conflict as FSI programs and norms are introduced in American colleges and universities where institutional subunits have substantial autonomy in the development of curriculum and the setting of educational goals. Lange (1987) sees a potential threat to the principles of academic freedom with the imposition of government norms (p.244).

Proficiency programs that depend on the rating score as the criterion for passing or failing need to find a way to accomodate traditional college course-credit systems, which, as Tonkin and Edwards (1981) noted, "have made American university study marvelously flexible, both for students who build a program in a single institution and for those who move from one institution to another"(p.169). This "common coin of academic credit" has become a universal in the American post-secondary educational system, and is not likely to disappear (Tonkin and Edwards, p.169). Young (1980) has proposed the placement of the proficiency score on student transcripts along with the letter grade for the course (p.66). Other institutions have tried to establish grade equivalencies or mathematical formulas to incorporate the rating into the students' grades (Magnan, 1985, p.141). However, these are developed on an institution by institution basis, and the universal value of the rating is lost in

the process.

Foreign language instruction is a labor-intensive enterprise. In order to replicate the successes of FSI programs, small classes are necessary. The testing procedure itself is also a labor-intensive activity. Young (1980) has noted that the adaptation of proficiency programs carries additional costs, and requires at least two testers for each student for a time period of twenty to forty minutes (p.68). Foreign language departments with graduate programs may need to hire additional teaching assistants or instructional staff. Those departments without graduate programs will need to hire additional instructional staff on either permanent or temporary appointments. Additional personnel will impact institutional instructional costs and raise issues related to staff benefits and tenure. The management of OP programs requires substantial material investment and professional effort; much of the latter may be assigned to untenured

assistant professors (Freed, 1987). Young (1980) observed that the hiring of additional staff is unlikely to occur during periods of economic difficulty (p.68). There are other cost factors related to the OP curriculum, including the absence of a complete set of OP tests for all languages. Groenings (1983) has observed that it would take many years and the investment of substantial resources to develop a system of OP tests for all languages (p.5). Departments may not have the financial resources to send faculty and teaching assistants to ACTFL-ETS rater training workshops (Smith, 1984). Even at relatively wealthy institutions such as the University of Southern California (Lower Division), language programs did not have such resources (Smith, p.244). OP testers require training, because the scale cannot be correctly used without it (Lowe, 1983; Smith, 1984). Departments and institutions must respond to the questions concerning training, and whether or not teaching staff must

assume the responsibilities and pay the opportunity costs. If the latter course of action is chosen, then OP training must be part of the job description prior to the hiring of staff.

There may also be problems regarding the selection of OP testers. Given the levels of tenure in many college and university foreign language departments, choices may be limited with regard to the alternatives involving the retraining of existing personnel or the hiring of OP specialists. If the first alternative is selected, there must be agreement among existing staff members. According to Van Meter and Van Horn (1975), "programs that require major change frequently lead to goal conflict on the part of relevant actors"(p.460). The OP curriculum cannot be considered a matter involving minor change/low consensus politics: "Where major change is mandated and goal consensus is low, the prospects for effective implementation will be most doubtful"(Van Meter and Van Horn, 1975, p.461).

The OP curriculum can be viewed as a largely voluntary undertaking. The transient nature of teaching assistants would necessitate a continual investment of time and resources in training and retraining. The University of Cincinnati Department of German has affirmed this process (Toliver, 1984), while the University of Southern California deemed the ACTFL-ETS scale "impractical for use in a large department that depends on transient graduate student labor for teaching and testing" (Smith, 1984, p.245). Finally, staffing needs may or may not be taken into account during annual institutional budget planning. In recent years, many departments have had to revert a percentage of their annual budget to the central administration either to forestall an institutional deficit or to generate funds for new programs.

Students are major sources of confounding variables that impact policy performance. Variables include aptitude,

attitude, preparation, age, career goals, and ethnic heritage. Fewer and fewer institutions can expect their student bodies to be homogeneous. Unfortunately, there is a paucity of research on these variables as they relate to the OP curriculum. Smith (1984) reports that the percentage of students who were taking Spanish at USC only because it fulfilled a requirment declined from 63% in 1981 to 40% in 1983, and that career considerations increased from 20% to 63% (p.243). These percentages are not even because students were able to select more than one response. Such figures imply the growth of a more positive attitude towards foreign language study. The relationship between not wanting to study a foreign language and a negative attitude comes about when students must fulfill a graduation requirement and do not view the course as being relevant to their lives and career aspirations.[2] The 40% negative attitude corresponds to the existence of

of a comparable percentage at the University of Pennsylvania, where about a third of the students viewed the addition of an OP requirement as just another requirement to be satisfied for graduation (Freed, 1987, p.145). Freed (1987) reported that students resented the requirement initially, but that enrollment had not declined as a demonstrable consequence. The effects of resentment or resignation on student performance or the retention of material in an OP curriculum are not determined.

If the FSI/ACTFL/ETS proficiency rating is to have a universal or global value, then the Guidelines should require uniform application in all programs. Until 1986, the word "provisional" was used to qualify the Guidelines. In their insightful analysis of the claims of OP, Lantolf and Frawley (1985) wrote: "It is rather specious to call the Guidelines 'provisional,' since it is tantamount to saying 'design your programs according to the Guidelines,

but don't blame us if the programs do not work, after all, the Guidelines are only 'provisional'"(p.342). Even the most outspoken advocates of the FSI/ACTFL/ETS oral proficiency guidelines report deviations from the norms. Freed (1987) noted that the passing level score for French and German at the University of Pennsylvania had to be lowered from Intermediate High to Intermediate Medium (p.140). In his lauditory appraisal of the OP German curriculum at Portland State University, Fischer (1984) qualifies FSI/ACTFL/ETS guidelines to ACTFL/ETS-style testing as something less than the ideal:

> . . .our tests and evaluation methods are not exact equivalents of ILR/ACTFL/ETS proficiency tests and ratings. But they are suitable to their purpose, which is the encouragement and measurement of what I consider to be the first and most momentous success in foreign language learning: the transition from virtual monolingualism to respectable Novice behavior and thence to the truely honorable Intermediate proficiency whose attainment should be the pride of both student and teacher (p.234).

Smith's (1984) description of the OP programs at the University of Southern California reveals the development of an in-house version of proficiency scales because of difficulties in implementing the ACTFL version of the FSI programs. A problem can be found in the fact that a level achieved in one testing system may not be equivalent to FSI/ACTFL/ETS ratings. The problem is underscored in Reschke's (1984) description of the American Institute of Musical Studies (AIMS) proficiency exam used in the Summer Vocal Institute in Graz, Austria. Toliver (1984) described another in-house variation in the OP curriculum at The University of Cincinati, the group oral interview. The interview apparently serves to compensate for both staff and time shortages. Now that the FSI/ACTFL/ETS proficiency scales have ceased to be provisional, how much of this institutional individuality and innovation is going to be tolerated? One characteristic of the American system of

higher education involves a reluctance to force the implementation of a unified language policy. In the absence of a system for rational decision making, the implementation process may depend upon the manipulation of symbolic and material rewards (Van Horn/Van Meter, 1975, pp.467-468). Other than the power of the federal government to grant or withhold subsidies to language programs or the power of state policy making bodies to set norms in state university systems, for example, there may be few direct means for directly advancing the implementation process. Thus, in the absence of a centralized authority, there is no fixed value which may be placed in the proficiency ratings of the FSI/ACTFL/ETS proficiency tests.

Lantolf and Frawley (1987) have questioned the normatively derived character of the FSI/ACTFL/ETS Guidelines, maintaining that the standard of the "educated native speaker" is neither a unitary nor a reliable construct, and that the

OP test is analytic and not criterion referenced:

> Tests of this type measure the performance of the second-language speaker in relation to an analytically derived hierarchy of criterion-reductive and implicitly norm-referenced definitions, with the norm itself being a dubious construct (pp.343-344).

They define analytic truth as something that is true by definition, convention, or by the rules of the language; a synthetic truth is true by empirical test. Because analytic truths are arbitrary, they are generally suspect. Other researchers (Day, 1987) are beginning to pay attention to Lantolf and Frawley's criticisms.

Thus, OP programs have not been able to meet the requirements of objective criticism according to the Lantolf/Frawley criteria and, therefore, do not meet Van Horn and Van Meter's requirement for clarity of standards and objectives. We have noted that even the most enthusiastic proponents of the FSI/ACTFL/ETS

Guidelines have found reasons for structural modifications in their own OP programs. The status of policy implementation after a decade reveals that Lambert's goal of a universal proficiency measure remains elusive.

FEEDBACK

Feedback regarding the successes or failures of the OP curriculum/testing is available, for the most part, via perceptions. The implementation of the OP guidelines has not been monitored using systematic assessment mechanisms, since the proficiency rating alone was deemed a sufficient measure. Apparently, no longitudinal studies pertaining to material retention or employment have been undertaken. The only study cited in the literature was conducted by Carroll (1967). In the study, college language majors attained an average rating score of L2 on the FSI exams, a score required by the government of its foreign service officers. The study has not been replicated with students who

studied under OP curriculums of the last decade.

In 1983, Lowe applauded the addition of an OP score to the foreign language requirement at the University of Pennsylvania. In 1987, Freed, an enthusiastic advocate of OP at Pennsylvania, stated: "We are still unable to demonstrate that proficiency based instruction actually improves language learning"(p.145). In order to achieve the required L2 passing score, students were still spending an average of four semesters in language classes and developed a limited proficiency; there was no means in place for the assessment of motivation, willingness to continue beyond the requirement, or the retention of material learned. The government has not published any data, to date, that may be used to document the performance of OP college/university trained individuals with regard to FSI exams. OP advocate Byrnes (1987) has acknowledged the lack of replicable or replicated research (p.52). Swaffar

(1981 reported that Freed had initiated such an assessment project at the University of Pennsylvania (p.281). However, an examination of Freed's work reveals no reference to outcomes from the research project that was announced in 1981. Some college and university programs may have replicated reported FSI achievements with an equally optimal mix of variables -- institutional support, plentiful resources, trained staff, agreement on goals along with able, prepared, and motivated students. Published data or reports which indicate successful outcomes of OP programs are yet to be made available.

Questions may be raised regarding whether or not the OP guidelines are intended to produce specialists. Heilenman and Kaplan (1985) recognized that the levels of proficiency attainable by the majority of college

students under the learning conditions currently prevalent in the United States are, as yet, unknown (pp.60-62). They suggest that an OP curriculum would be successful, if it placed limits on its expectations. What is needed are not beginning courses aimed at the development of specialists, but rather self-contained courses aimed at the majority of students, in which at least one skill level would achieve an intermediate proficiency rating. Such a practical approach demands neither more time from students nor more funding resources, realistically recognizes the limited nature of proficiency, and forestalls a serious public relations problem resulting from attempting to do it all.

Heilenman and Kaplan have opted for a solution inconsiderate of operant organizational conditions in institutions of higher education where models of rational choice have low utility. They pragmatically recognize

that language learning is not a linear activity directly proportional to the amount of time invested. If we were to presume that colleges and universities functioned as institutions of rational choice, we can understand why there is an expectation of analytic truth at the core of the ACTFL/ETS guidelines. Lantolf and Frawley (1987) have perceived the ultimate political nature of the guidelines in describing them as "complicated ways of proving, propagating, and imposing analytic truths with reference to the world, and then masking these claims as empirical truths which reify pseudo-observations as fact"(p.339). Kramsch (1987) has used the succinct term "apodictic," meaning something necessarily true, to describe the claims of the guidelines (p.7). The controversy surrounding them is a manifestation of the conflict between professional pragmatism and critical humanism in education; between short-term and long-term goals in language

learning (p.48).

Ultimately, "momentum" becomes the political rationale for implementation of the OP guidelines. According to Young (1980), if OP is made a question of quality and prestige, most people will gradually go along, but if too much external pressure is exerted the "vein of anarchy in American academic tradition will be intensified"(p.67). Young revealed his awareness of the potential unpredictability of the anarchical organization, and its relevance in American higher education.

Finally, questions remain regarding how the other language skills of listening, reading, and writing are to be accomodated in a program with an OP emphasis. Young (1980) conceded that an OP rating is not a valid assessment of those skills. According to Lange (1987), empirical research has not provided a clear picture of what works or what does not work in foreign language education, where

there is a wide variety of uncontrolled variables and where research raises more questions than it answers.

SUMMARY

The Van Horn/Van Meter policy implementation model along with three of Pfeffer's models of organizational decision making have provided the framework for examining the implementability of OP guidelines in American institutions of higher education. The experiences of the past decade have suggested a number of questions, inconsistencies, and problems with regard to FSI/ACTFL/ETS oral proficiency guidelines. Increasingly, OP advocates will confront institutional policy makers and curriculum committees with the request to implement an OP policy. It remains to be seen as to whether or not they will agree to implementation on the face value of the oral proficiency claims. Enthusiastic, detailed descriptions of classroom activities and testing procedures do not substitute for longitudinal,

standardized assessments of outcomes. Neither the government nor those entities currently applying the OP curriculum have conducted such assessments to date. At some point in time, empirically derived data must replace perceptions.

Research suggests that there is a relationship between the amount of time devoted to the study of a foreign language and the achievement of proficiency. The activity of language learning itself, however, is non-linear in character, and, in the absence of total immersion in the foreign linguistic environment, takes a great deal of time. Adequacy of time allotted to language learning appears to be a critical factor in explaining relative success in American foreign language programs.

This study has presented a number of suggestions: specifically that (1) the successful implementation of the FSI/ACTFL/ETS guidelines depends on a large number of

variables, many of which are uncontrollable; that (2) the political nature of institutions of higher education and their anarchical organizations may not support rational choices or the achievement of targeted policy outcomes; that (3) OP advocates may tend to overlook individual institutional characteristics and the availability of resources; that (4) there may be unrealistic expectations for student achievement on the proficiency scale; that (5) elite colleges and universities have a greater probability of success in the implementation of the OP guidelines because they also have more resources; that (6) internal innovations of campus OP programs may confound the universal value of the proficiency score; and that (7) OP claims will continue to be questioned, given the absence of replicable research.

The implementation of a foreign language program based on the FSI/ACTFL/ETS oral proficiency guidelines is a serious institional undertaking which should not be

left to foreign language faculties alone. Such a decision impacts an entire institution, and should be critically examined in the context of the respective organizational environments.

APPENDIX A

The FSI/ACTFL/ETS proficiency scale, as reproduced in Alice Omaggio, TEACHING LANGUAGE IN CONTEXT (Boston,MA: Heinle and Heinle, 1986), p.11:

FSI	ACTFL/ETS	
5	Native	educated native speaker
4+ 4	Superior	Accuracy is nearly equivalent to native speaker, occasional errors.
3+ 3	Sporadic errors in basic structure.	Accuracy: Errors never interfear with understanding and rarely disturb native speakers.
2+ 2	Advanced Plus Advanced	Sometimes miscommunicates. Understandable to natives not used to dealing with foreigners.
1+ 1 1-	Intermediate High Interm. Medium Interm. Low	Survival needs, limited social demands; intelligible to natives used to dealing with foreigners. Basic survival, minimum courtesy requirements
0+ 0	Novice High Novice Mid.	
	Novice Low	unintelligible.

END NOTES

[1] A recent study reported in the NEWS BULLETIN of the ERIC/Clearinghouse on Languages and Linguistics (March 1988) suggested that scarcity of resources is a major problem for foreign language programs, especially at the K-12 level (p.7).

[2] Swaffar (1981) notes that students resent the amount of time that even a non-intensive language program takes in comparison to the time demands of other subjects, and that this resentment contributes to early attrition rates of 35 to 50 percent between the first and second semesters (p.281).

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